

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ROBERT HARRINGTON, et al.,

Plaintiffs,

v.

Civil Action No. 04-12558-NMG

DELTA AIRLINES, INC., et al.,

Defendants.

**DEFENDANT ALASKA AIRLINES' MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION**

Pursuant to Fed. R. Civ. P. 12(b)(2), Defendant Alaska Airlines, Inc. ("Alaska"), moves to dismiss Plaintiffs' claims against Alaska for lack of personal jurisdiction.<sup>1</sup> Plaintiffs have failed to allege any facts authorizing personal jurisdiction under the Massachusetts long-arm statute. Moreover, the exercise of jurisdiction over Alaska would be inconsistent with federal standards of due process.

In support of this Motion, Alaska relies upon Defendant Alaska Airlines' Memorandum of Law In Support of Its Motion to Dismiss For Lack Of Personal Jurisdiction, the Affidavit of Carla Weiler In Support of Alaska's Motion to Dismiss For Lack Of Personal Jurisdiction, and the Affidavit of Michael L. Cornell In Support of

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<sup>1</sup> This Motion is filed concurrently with a Rule 12(b)(6) motion filed by all of the domestic airline defendants (Alaska Airlines, Delta Air Lines, American Airlines, Northwest Airlines, Continental Airlines, Southwest Airlines) and Defendant Air Transport Association of America, Inc. ("ATA") as well as a Rule 12(b)(2) motion filed by Defendant ATA.

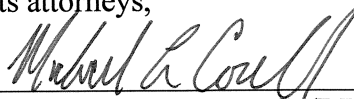
Alaska's Motion to Dismiss For Lack Of Personal Jurisdiction, each of which are filed herewith.

Because the assertion of personal jurisdiction over Alaska would violate both the Massachusetts long-arm statute and federal due process standards, Alaska respectfully requests that the Court dismiss it from this action pursuant to Rule 12(b)(2).

Respectfully submitted,

**ALASKA AIRLINES, INC.**

By its attorneys,



Date: January 31, 2005

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